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IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

LI YING HUA, LI ZHENG ZHE and XU JING JI,) CASE NO. CV 05-0019

Plaintiffs,)

vs.)

JUNG JIN CORPORATION, a CNMI corporation,)
ASIA ENTERPRISES, INC., a CNMI corporation,)
PARK HWA SUN and KIM HANG KWON,)

Defendants.)

APPLICATION FOR
INCREASED TIME

Date: Thursday, August 10, 2006
Time: 9:00 a.m.
Judge: Hon. Alex R. Munson

COMES NOW the Plaintiffs, by and through the undersigned counsel of record, with a
application to increase the time for filing Plaintiffs' Motions for Summary Judgment and for Default
Judgment filed this day — July 15, 2006.

Previously, the Court modified its Case Management Scheduling Order to extend by an
additional two weeks the time for filing dispositive motions. The increase was due, in part, to the
fact that recent motions practice altered time frames in the case, and the time for defendants (non-
defaulting) to file their response to Plaintiffs' First Amended Verified Complaint had not yet come.
The Court, on July 3, 2006, extended the deadline for filing dispositive motions for two weeks to July
14, 2006. The non-defaulting defendants have not answered the First Amended Verified Complaint.

1 Because of reasons associated with compiling documents for filing electronically on the
2 Court's new system, and problems Plaintiffs' counsel and staff encountered when using the Court's
3 new e-filing system, Plaintiffs' counsel underestimated the time it would take to accomplish a filing
4 of the scope of Plaintiffs' Motion for Summary Judgment. The Motion was filed twenty minutes
5 after midnight — the morning of July 15 — twenty minutes late.

6 Plaintiffs' Motion for Default Judgment against the two previously defaulted defendants was
7 filed early this day, after the Motion for Summary Judgment.

8 Neither late motion filing will alter the briefing schedule and all motions and supporting
9 documentation will be served at the same time they would have had the Motions been filed before
10 midnight on Friday, July 14, 2006. Accordingly, no party may argue that it is prejudiced by the half-
11 day delay in e-filing the motions. No other dates set by the Court will change if the extension
12 applied for herein is granted.

13 Wherefore, Plaintiffs respectfully request that the Court allow the extended time and the
14 filing of Plaintiffs' Motions for Summary Judgment and for Default Judgment as they were filed
15 today, July 15, 2006 — one day late. Plaintiffs further waive any hearing on this application.
16

17 Respectfully submitted this 15th day of July, 2006.
18

19 /s/ Mark B. Hanson

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